

5. My business address is 175 N. Street NE, Washington, DC 20002-3371.
6. I am a licensed attorney and member in good standing of the New York bar.
7. My bar identification number is 5511068.
8. I have not been subject to any disciplinary actions concerning my practice of law.
9. I am a registered user of ECF in the United States District Court for the Western District of Pennsylvania.
10. I have read, know, and understand the Local Rules of Court for the United States District Court for the Western District of Pennsylvania.
11. I understand that LCvR 83.2(B) requires, among other things, that I “attach to th[is] affidavit one current certificate of good standing from the bar or the court in which the affiant primarily practices.”
12. Certificates of good standing in the Appellate Division of the Supreme Court for the State of New York, Second Judicial Department (the “Appellate Division”), where I am admitted, can only be obtained in person at the general clerk’s office or by mail.
13. Due to the novel coronavirus disease (COVID-19) pandemic, several states and local jurisdictions have issued “shelter-in-place” or “stay-at-home” orders, which are to remain in effect for various periods of time. Such an order is in place in New York City, where the Appellate Division is located, until at least June 15, <https://coronavirus.health.ny.gov/home> (last visited May 20, 2020).
14. The Appellate Division has issued several notices in response to the COVID-19 crisis, including that attached as Exhibit A, indicating the Court’s facilities have been closed and the Court has been functioning with limited staff and operations since March 17, 2020.
15. Although I have submitted a request for an official copy of my certificate of good standing to the Appellate Division’s general clerk’s office, it is possible, if not likely, that my request will not be processed or I will not receive my certificate by May 29, 2020, which is the current deadline for Defendant “Steve” Last Name Unknown to respond to the complaint.
16. In lieu of that official certification, I am attaching Exhibit B as documentary proof that I am an active member of the bar of the State of New York, in good standing, with no record of public discipline.

17. Based upon the foregoing, I respectfully request that I be granted *pro hac vice* admission in this matter.

18. Should the Court request, I can provide any additional information necessary.

I certify and attest that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are false, I am subject to punishment.

Dated: May 21, 2020

Respectfully submitted,

/s/ David Inkeles

DAVID W. INKELES

Trial Attorney (NY Bar No. 5511068)*

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**Pro Hac Vice Admission Pending*